

ORIGINAL

GREENBERG TRAURIG, LLP
James W. Perkins (JWP-6684)
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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

COMPAÑIA DEL BAJO CARONI (CAROMIN), C.A.,
Calle Cuenca, Manzana 7, Campo B de Ferrominera
Quinta Analú, Puerto Ordaz, Estado Bolívar Venezuela,
and

V.M.C. MINING COMPANY, C.A.,
Calle Cuenca, Manzana 7, Campo B de Ferrominera
Quinta Analú, Puerto Ordaz, Estado Bolívar Venezuela.

Plaintiffs,

- against -

BOLIVARIAN REPUBLIC OF VENEZUELA,
c/o Consulate General of Venezuela
7 East 51st Street
New York, New York 10022, and

MINISTRY OF BASIC INDUSTRIES AND MINES
c/o Consulate General of Venezuela
7 East 51st Street
New York, New York 10022,

Defendants.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, James W. Perkins, Esq., a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

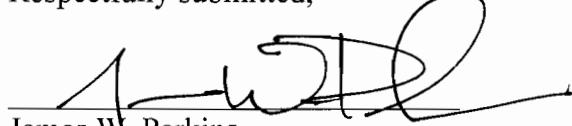
ROBERTO MARTINEZ, ESQ.
Colson Hicks Eidson
Colson Hicks Eidson
255 Aragon Avenue, 2nd floor
Coral Gables, Florida 33134
Tel: (305) 476-7400
Fax: (305) 476-7444

ROBERTO MARTINEZ, ESQ. is a member in good standing of the Bar of the State of Florida.

There are no pending disciplinary proceedings against ROBERTO MARTINEZ, ESQ. in any State or Federal court.

Dated: August 20, 2007
New York, New York

Respectfully submitted,



James W. Perkins
SDNY Bar (JWP-6684)
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
COMPAÑIA DEL BAJO CARONI (CAROMIN), C.A.,
Calle Cuenca, Manzana 7, Campo B de Ferrominera
Quinta Analú, Puerto Ordaz, Estado Bolívar Venezuela,
and

V.M.C. MINING COMPANY, C.A.,
Calle Cuenca, Manzana 7, Campo B de Ferrominera
Quinta Analú, Puerto Ordaz, Estado Bolívar Venezuela,

Plaintiffs,

- against -

BOLIVARIAN REPUBLIC OF VENEZUELA,
c/o Consulate General of Venezuela
7 East 51st Street
New York, New York 10022, and

MINISTRY OF BASIC INDUSTRIES AND MINES
c/o Consulate General of Venezuela
7 East 51st Street
New York, New York 10022,

Defendants.

----- X
STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

JAMES W. PERKINS, being duly sworn, deposes and says:

1. I am a Shareholder with the firm Greenberg Traurig, LLP, attorneys for Compañía Del Bajo Caroni (Caromin), C.A, and V.M.C. Mining Company, C.A. the Plaintiffs in this action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Roberto Martinez, Esq., as counsel *pro hac vice* to represent Plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on March 22, 1988. I am so admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Roberto Martinez, Esq. since early 2005.

4. Mr. Martinez is a Shareholder at Colson Hicks Eidson in Florida and a member of the bar of the State of Florida in good standing. I attach hereto as Exhibit A, a Certificate of Good Standing for Mr. Martinez.

5. I have found Mr. Martinez to be skilled attorney and person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

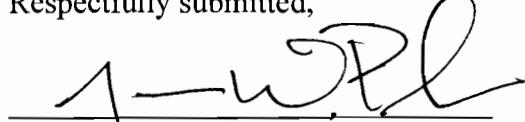
6. Accordingly, I am pleased to move the admission of Roberto Martinez, Esq., *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of Robert Martinez, Esq., *pro hac vice*, which is attached hereto as Exhibit B.

WHEREFORE, it is respectfully requested that the motion to admit Roberto Martinez, Esq. *pro hac vice*, to represent Plaintiffs in the above captioned action, be granted.

Dated: August 20, 2007
New York, New York

Respectfully submitted,



James W. Perkins
SDNY Bar Code: (JWP-6684)

Sworn to before me this
20th day of August, 2007



Christy Schaeffer
Notary Public

CHRISTY SCHAEFFER
Notary Public, State of New York
No. 31-4769958
Qualified in New York County
Commission Expires August 31, 2010



The Florida Bar

JOHN F. HARKNESS, JR.
EXECUTIVE DIRECTOR

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State of Florida)

County of Leon)

In Re: 305596
Roberto Martinez
Colson Hicks Eidson
P.O. Box 141108
Coral Gables, FL

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on October 22, 1980.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this 1st day of August, 2007.

A handwritten signature in black ink that reads "Willie Mae Shepherd".

Willie Mae Shepherd
Supervisor, Membership Records
The Florida Bar

AFFIDAVIT OF SERVICE BY REGULAR MAIL

NATALIE ALCEE-SEEPERSAD, being duly sworn, deposes and says:

I am not a party to this action, I am over 18 years of age and reside in Queens, New York.

On August 20, 2007, I served the within MOTION TO ADMIT COUNSEL *PRO HAC VICE*, AFFIDAVIT OF JAMES W. PERKINS, ESQ., IN SUPPORT OF MOTION TO ADMIT COUNSEL OF *PRO HAC VICE* with the attached Exhibits A through B by depositing a true copy thereof enclosed in a post-paid wrapper, in an official depository under the exclusive care and custody of the United States Postal Service within New York State, addressed to:

Kenneth S. Leonetti, Esq.
FOLEY HOAG, LLP
1875 K Street, N.W.
Washington, D.C. 20006

NATALIE ALCEE-SEEPERSAD

Sworn to before me this
20th day of August, 2007

Christy Schaeffer
Notary Public